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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

**FATHERS & DAUGHTERS NEVADA,
LLC,**

Plaintiff,

v.

LINGFU ZHANG,

Defendant.

Case No.: 3:16-cv-01443-SI

**DECLARATION OF SEAN WALSH
IN SUPPORT OF PLAINTIFF'S
MOTION FOR RECONSIDERATION**

I, Sean Walsh, declare and state:

1. I am Counsel, Legal Affairs for Voltage Pictures, LLC and I am authorized to make this declaration on their behalf. The following is true of my own personal knowledge and if called as a witness I could and would testify competently to all of it.

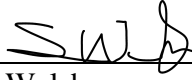
2. I am familiar with Sales Agency Agreement between Goldenrod Holdings and Voltage Pictures, LLC (together "Goldenrod") and Fathers & Daughters, LLC ("F&D") dated as

of December 20, 2013 with respect to the motion picture *Fathers & Daughters* (the “Sales Agency Agreement”). The Sales Agency Agreement is a common type of instrument made in the regular course of business by Voltage.

3. Paragraph 3.e of the Sales Agency Agreement is a common provision that authorizes a sales agent to claim and collect income (“entitlements”) for certain collectively management interests, including but not limited to, for cable retransmission, rental levies, and private copy levies, and well as income from infringement suits.

I declare under penalty of perjury of the State of California that all of the above is true and correct.

Done on February 14, 2018, in Los Angeles County, California.

By:  _____
Sean Walsh